

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SEAN YOUNG, FOREVER YOUNG	:	
BAKERIES LLC; and FOREVER YOUNG	:	
PROPERTIES LLC,	:	
	:	
<i>Plaintiffs,</i>	:	
	:	
vs.	:	Civil No. 1:23-cv-00070-JL
	:	
TOWN OF CONWAY, NEW HAMPSHIRE	:	
	:	
<i>Defendant.</i>	:	
	:	

**PLAINTIFFS' ASSENTED TO MOTION TO EXTEND DEADLINE FOR FILING
MOTION FOR ATTORNEYS' FEES**

Plaintiffs Sean Young, Forever Young Bakeries LLC, and Forever Young Properties LLC respectfully submit this Motion to Extend Deadline for Filing Motion for Attorneys' Fees. Defendant has assented to this motion, and no previous extension has been requested for the deadline to file Plaintiffs' motion for attorneys' fees.

This Court entered a final judgment in Plaintiffs' favor on May 19, 2025 (ECF 59) with a corrected judgment entered on May 20, 2025 (ECF 60). The current deadline for Plaintiffs to file an application for attorneys' fees under 42 U.S.C. § 1988 is therefore June 2, 2025. Fed. R. Civ. P. 54(d)(2)(B)(i) (application must be filed no later than 14 days after entry of judgment). This date may be altered by court order. *See* Fed. R. Civ. P. 54(d)(2)(B). Because Plaintiffs' attorneys' fees will depend, in part, on the outcome of any appeal, it would be more efficient for the parties and the Court to stay all proceedings regarding Plaintiffs' motion for attorneys' fees until any appeal is resolved.

Plaintiffs therefore request that the deadline for filing a motion for attorneys' fees be stayed until 21 days after either: (1) receipt by the clerk of the mandate or other order terminating the action on appeal, or (2) expiration of the time allowed for filing a notice of appeal, in the event a notice of appeal is not filed. *Cf.* Local R. 54.1(a) (setting same deadlines for filing bill of costs).

RESPECTFULLY SUBMITTED this 23rd day of May 2025,

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**Admitted Pro Hac Vice*

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day forwarded to all counsel of record through the Court's electronic filing system.

May 23, 2025

/s/ Robert Frommer
Robert Frommer